

**Request for Waiver of FCC FORM 472 Deadline and Request for Waiver of FCC
FORM 472 Invoice Deadline Extension
Regarding CC Docket 02-06
Applicant: Barton County Library
BEN: 191648
FY 2015**

January 22, 2017

Contact Person/Filer: Lori Puckett
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Applicant Information
Carol Darrow
Email: cdarrow@bclib.info
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RE: Request for Waiver of FY 2015 FCC Form 472 BEAR Invoice Deadline and
Request for Waiver of Invoice Deadline Extension

Purpose of Request for Waiver of FCC Form 472: To file a new BEAR that would replace the original FCC Form 472 Invoice ID: 2443717 filed on time and before the FY 2015 Deadline of 10/31/2016.

Purpose of Request for Invoice Deadline Extension Waiver: Extraordinary circumstances occurred after the Invoice Deadline Extension Request Date. At the time of the Invoice Deadline Extension, we did not have reason to file for an extension as we had already filed the FCC Form 472 on time.

Details of FCC Forms Filed for this request

FCC Form 471 Application Number: 1011192
FRN: 2796527
Funding Status: Funded
Service Type: Internet Access
FCC Form 470 Application Number: 775240001289127
SPIN: 143001192

SP: AT&T
FY: 2015
Service Start Date: 07/01/2015
Service End Date: 06/30/2016
FCDL: 05/21/2015
Pre -Discount Amount: \$9808.20
Funding Commitment Decision: \$7846.56
FCC Form 486 Number: 1069312, Certification Date: 06/17/2015

10/04/2016- The invoicing mode was to be SPI, but upon running the DRT report on 10/04/2016 and reaching out to AT&T and USAC CSB, no discounts were indicated as disbursed, we were directed to file a FCC Form 472 by USAC CSB.

FCC Form 472 Certification Date: 10/04/2016, Invoice ID: 2443717
FCC Form 472 Notification Letter Date: 10/13/2016, Total Amount of Reimbursement Approved for Payment \$7846.56

10/06/2016- SLD BEAR Program Remittance Statement as of October 6, 2016
For approved amount of \$7846.56

Events that followed after filing a timely FCC Form 472 that leads to this Request for Waiver

10/10/2016 Carol Darrow, Barton County Library, contacted Lori Puckett, Consultant and informed that the discounts from AT&T were applied to her bills, this was after Barton County Library was issued the \$7846.56 in reimbursements via direct transfer from USAC on 10/06/2016.

10/13/2016 USAC CSB was informed that discounts for this FRN were applied to the applicant's invoices from the service provider. Barton County Library and Consultant were instructed by USAC CSB to fill out a Payment Identification Worksheet and issue payment to USAC for the \$7846.56, this form was completed and a check was issued by Barton County Library on 10/13/2016 to Collections at USAC for this amount.

10/18/2016 Check issued to USAC Collections from Barton County Library was cashed for the \$7846.56

10/24/2016 Email received from USAC Customer Operations/Collections stating that USAC is in receipt of the \$7846.56 in returned payment from Barton County Library.

11/21/2016 Barton County Library received their AT&T billing date of 11/10/2016 that reversed the discounts for the library in the amount of \$7846.56.

11/29/2016 Call to USAC CSB. Referred by Danita Stands (CSB) to USAC BCD. Contacted USAC BCD and USAC BCD referred us back to USAC CSB.

11/30/2016 Joshua Robinson of the SLD, CSB was contacted. A request for an Administrative Remedy per USAC's invoicing instructions on usac.org was declined even though there was an invoice filed on 10/04/2016, 27 days prior to the deadline. Mr. Robinson stated that a Request for Waiver would need to be filed even though the FCC Form 472 Invoice was filed on time.

11/30/2016-12/09/2016- Several calls, EPC inquiries and customer service cases to USAC CSB to obtain direction to get this matter resolved due to extraordinary circumstances.

12/09/2016- USAC News brief issues statement for Appealing USAC Decisions on Invoices stating: "If the invoice was timely filed, applicants and services providers should NOT file an invoice deadline waiver request with the FCC. Doing so will delay action on your issue and may cause you to miss the 60 day appeal deadline."

12/09/2016-12/13/2016-

Based on the 12/09/16 News Brief Directions, additional discussions with USAC CSB and Barton Library were had to determine the correct process to be followed to get issue resolved. Directed again by CSB to file an Appeal with USAC.

12/13/2016- Appeal filed with USAC to Request for Re-Issuance of FCC Form 472 BEAR invoice amount of \$7846.56 for the Original FCC Form 472 Invoice ID 2443717 filed on time on 10/04/2016 and AT&T FY 2015 charges paid in full.

01/03/2017- Receipt of Administrator's Decision on Appeal. Appeal was denied stating that appeal filing was postmarked more than 60 days after the date of the FCDL being issued.

01/14/2017-01/16/17- Case #145368 threads with EPC CSB requesting a conversation with a USAC Invoicing Manager to discuss issues and get matter resolved.

01/18/2017 Contact by Cory at USAC CSB Lawrence, KS. Directions from Cory are as follows: Barton County Library bills to AT&T are paid in full and approved funds that were disbursed to Barton County Library were returned to USAC Collections based on previous guidance by USAC CSB and still need to be reimbursed via A BEAR. In order to receive approved reimbursements 1st file an Appeal with the FCC to Waive the Deadline for the Invoice Deadline Extension Request. In the scenario this is approved, an Invoice Deadline extension is to be requested with USAC, in the scenario that this is approved a BEAR will then need to be filed.

We respectfully Request a Waiver for the FCC Form 472 Invoice Deadline to file a new FCC Form 472 for Barton County Library as all forms were filed by the deadlines so that they may receive the discounted amount that they were approved for.

In addition, we respectfully Request a Waiver for the FCC Form 472 Invoice Deadline Extension Date to file a new BEAR to be reimbursed for the approved funding amount of \$7846.56 as events occurred after the original deadline for the Invoice Deadline Extension date.

Sincerely,
Lori Puckett
Filer/Consultant



Universal Service Administrative Company
Schools & Libraries Division

Administrator's Decision on Appeal – Funding Year 2015-2016

January 03, 2017

Lori Puckett
Barton County Library
Federal Funds Assistant Llc
1416 16th Avenue
Camanche, IA 52730

Re: Applicant Name:	BARTON COUNTY LIBRARY
Billed Entity Number:	191648
Form 471 Application Number:	1011192
Funding Request Number(s):	2796527
Decision Letter Date:	October 13, 2016
Date Appeal Postmarked:	December 13, 2016
Your Correspondence Dated:	December 13, 2016

Our records show that your appeal was postmarked more than sixty (60) days after the date the Universal Service Administrative Company's (USAC's) FCC Form 472 (BEAR) Notification Letter was issued, as shown above. Federal Communications Commission (FCC) rules require applicants to postmark submit appeals within 60 days of the date of the USAC decision or action that is being appealed. Your appeal, as noted above, was postmarked after the appeal deadline. FCC rules do not permit USAC to consider your appeal.

If you wish to appeal this decision, you may file an appeal pursuant to 47 C.F.R. Part 54, Subpart I. Detailed instructions for filing appeals are available at:
<http://www.usac.org/sl/about/program-integrity/appeals.aspx>.

Schools and Libraries Division
Universal Service Administrative Company